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SUBMISSION TO: Draft Glenfield to Macarthur Urban Renewal Corridor Strategy

24 August 2015

1. Introduction

This submission has been prepared to provide a landowner's perspective on the *draft Glenfield to Macarthur Urban Renewal Corridor Strategy – July 2015* ("the corridor strategy"). AI Maha Pty. Ltd is the owner of 2 and 8 Farrow Road, Campbelltown ("the subject sites"). The subject sites have frontage to Farrow Road and Badgally Road and are of significant proportions. The sites are situated directly adjacent to Campbelltown Railway Station and currently support a variety of lower order industrial land uses which are arguably not the most desirable use of the land. In the short-term, these land uses will continue, however, the landowner is keen to work with the local council and/or State Government to encourage the urban renewal of the Campbelltown Precinct through the redevelopment of the subject sites for higher density residential land uses, including supporting commercial land uses.

We are pleased that the Department of Planning and Environment recognises the potential that exists in the Glenfield to Macarthur corridor and has produced an urban renewal strategy that is visionary. However, as detailed below, we argue that the strategy does not provide for sufficient residential density (floor space ratio) and appropriate built form (building height) to enable the vision to be realised. In particular we argue that land in the immediate proximity of the Campbelltown Central Business District and Campbelltown Railway station is deserving of building heights significantly greater than 7 to 12 storeys.

We trust that this submission will be properly considered as the Government works towards the finalisation of the corridor strategy and we would welcome the opportunity to meet with the appropriate officers of the Department of Planning and Environment to discuss our submission in further detail.

Should there be any further enquires in relation to this submission, AI Maha Pty. Ltd. may be contacted on telephone number 9764 5111 during business hours.

2. Site Description

2.1. Site Location and Details

The land to which this submission relates is 2 and 8 Farrow Road, Campbelltown.

The land is located within the Campbelltown Local Government Area and is subject to the provisions of the Campbelltown (Urban Area) Local Environmental Plan 2002. The subject site is zoned 4(b) – Industry B zone. The subject sites contain large floorplate industrial buildings which occupy the majority of the sites.

The aerial view of the sites is shown in **Figure 1**.

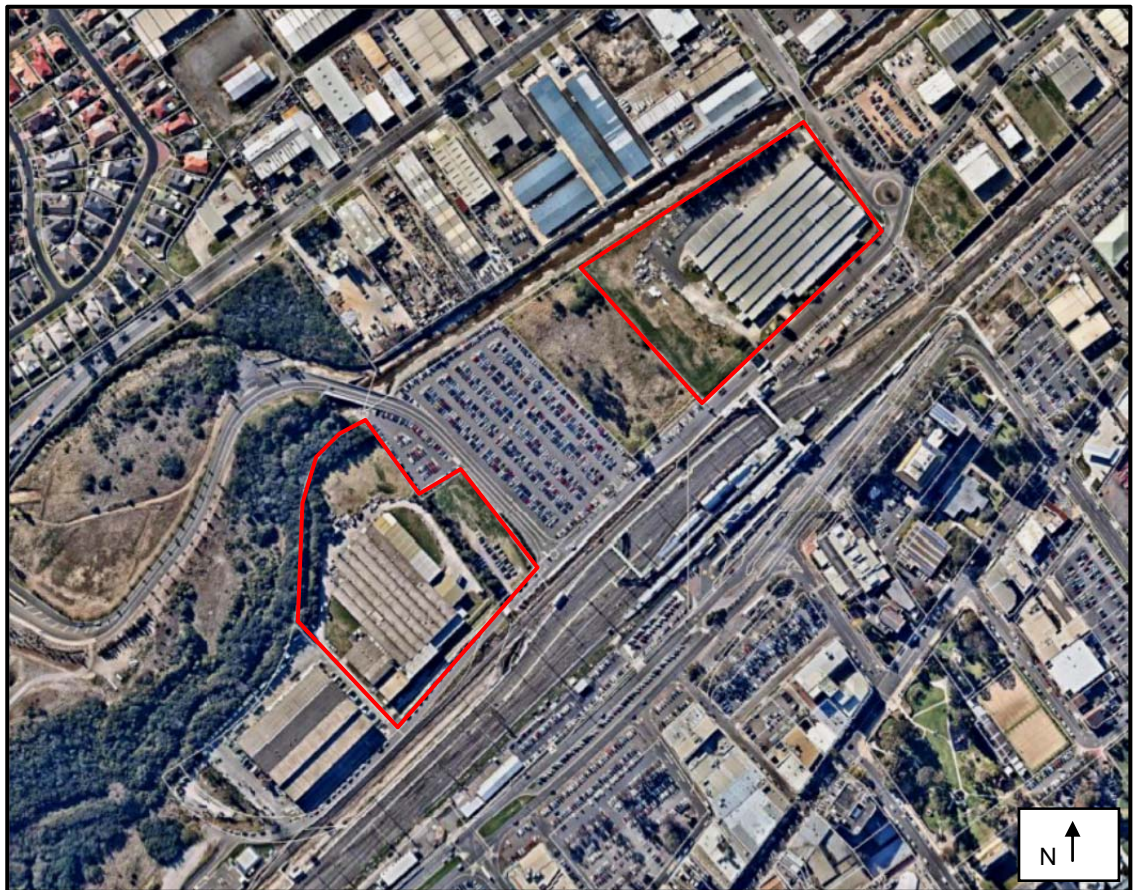
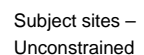


Figure 1. Location Plan (Source: PhotoMaps by Nearmap 10 August 2015)

The precinct planning approach and the identification of unconstrained land where redevelopment can readily occur is of great value. For instance the mapping of ecological, bushfire, flooding, drainage and heritage to produce a map of unconstrained land as depicted below is clearly the most effective means of prioritising planning efforts towards sites that are “shovel ready”.



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Furthermore, the Campbelltown Precinct – Land Use and Infrastructure Analysis recognises the need to address east-west connection over the rail corridor for improved access to goods and services.

Having reviewed the *draft Glenfield to Macarthur Urban Renewal Corridor Strategy* and *Campbelltown Land Use and Infrastructure Analysis* we are pleased to note that Local and State Government are working towards the encouragement of tangible urban renewal strategies. However, more work needs to be done. The draft corridor strategy must be refined to ensure opportunities for urban renewal are not discouraged through the application of inflexible and/or overly conservative development standards.

4. Areas of the draft Strategy not supported

While the draft corridor strategy makes some excellent observations regarding the potential in the corridor and sets the platform for further detailed planning, there are a number of notable omissions that require review. These matters are discussed below.

4.1. Consideration of market demand and project feasibility must be left to the applicant

It is stated that the draft corridor strategy aims:

Be informed by market demand and economic feasibility analysis.¹

While market demand and economic feasibility analysis are worthy considerations in the development of a strategy for the corridor, Government must acknowledge that those who will actually develop land will conduct their own detailed market demand and economic feasibility analysis and will make informed decisions on such analysis. The Government should refrain from making economic feasibility assumptions on behalf of the developer or investor who in all probability will have a distinctly different view on project feasibility, market demand and return on investment. Consideration of market demand and economic feasibility is important, but investment decisions must be left to the investor.

4.2 Development standards must be flexible

It is stated that steps for determining projected housing growth and jobs growth include:

Allocating a land use, development type, minimum lot size and *floor space ratio control* to every unconstrained site, as identified in each precinct's Land Use Infrastructure Plan.²

Reference is made to the Campbelltown Precinct Land Use Infrastructure Analysis and it is noted that floor space ratio is stated as a range. However, caution must be given to the blanket application of FSR without consideration of site area. **We suggest a flexible approach to FSR in a high level strategy document.** That is, it is preferable for the Strategy to state a *minimum* range in FSR that will be further refined in the detailed planning process. Stating absolutes, even if expressed as a range, at this early stage without the benefit of site specific urban design analysis is considered premature.

¹ Draft Glenfield to Macarthur Urban Renewal Corridor – Land Use and Infrastructure Strategy 2015. p.4

² Ibid. p.5

4.3 Highrise is more than 7-12 storeys

The draft corridor strategy makes the assumption that highrise is a building greater than 7 storeys³. The Campbelltown Precinct Land Use and Infrastructure Analysis suggests that highrise to be a built form of 7-12 storeys in locations close to the railway station⁴. We argue that highrise in close proximity to railway stations, particularly the station servicing the central business district should be considerably more than 12 storeys. Large unconstrained sites, adjacent to the railway station are able to accommodate appropriately designed buildings exceeding 12 storeys and in this regard it is suggested that the Campbelltown Precinct Land Use and Infrastructure Analysis Built Form be amended to state:

Provide a range of building heights, with buildings between 7 and 12 storeys. ***Buildings of 25 storeys should be permitted*** close to the station to maximise pedestrian activity and access to rail and bus services and increase trade for local businesses.

4.4 Housing projections should be expressed as minimums

Growth predictions and housing demand is not an exact science. Setting absolute targets to satisfy predicted growth invariably results in an undersupply of housing, particularly when considering twenty (20) year planning horizons. It is for this reason that the Government has tended to set housing targets in the recently released Metropolitan Strategy as minimums. The draft corridor strategy should also adopt this approach. Minimum targets for various housing types should be stated and the strategy should make it very clear that the targets are but a minimum. Furthermore, local environmental plans should ensure that there is capacity to exceed minimum housing targets.

4.5 Precinct and local planning must not hinder owner initiated planning proposals

It is accepted that precinct planning and local planning must be completed and implemented to realise the vision articulated in the draft corridor strategy. However, detailed planning will take considerable time and may not properly consider individual circumstances. Owner initiated planning proposals can be advantageous in such circumstances. That is, once a framework is in place, for instance the adoption of a state level strategy, owners may be willing to commission their own detailed urban design investigations to support planning proposals consistent with the state level plan or strategy. Accepting this approach is not only advantageous to the landowner. Detailed investigations, funded by a landowner can contribute to wider scale precinct level planning enabling the delivery of local planning in a more timely fashion.

³ Draft Glenfield to Macarthur Urban Renewal Corridor – Land Use and Infrastructure Strategy 2015. p.5

⁴ Draft Campbelltown Precinct – Land Use and Infrastructure Analysis. p. 16

5. Suitability of the subject sites

The subject sites have a number of locational advantages and are considered to have the potential to act as the catalyst to the urban renewal of underutilised industrial land as detailed below.

5.1 The subject sites are adjacent to the railway station

As depicted in the figure below, the subject sites are located adjacent to the Campbelltown Railway Station providing an excellent opportunity to increase housing within easy walking distance to public transport services. Furthermore, with improved link infrastructure the subject site and hence entire northern precinct could become connected to the Campbelltown Central Business District.

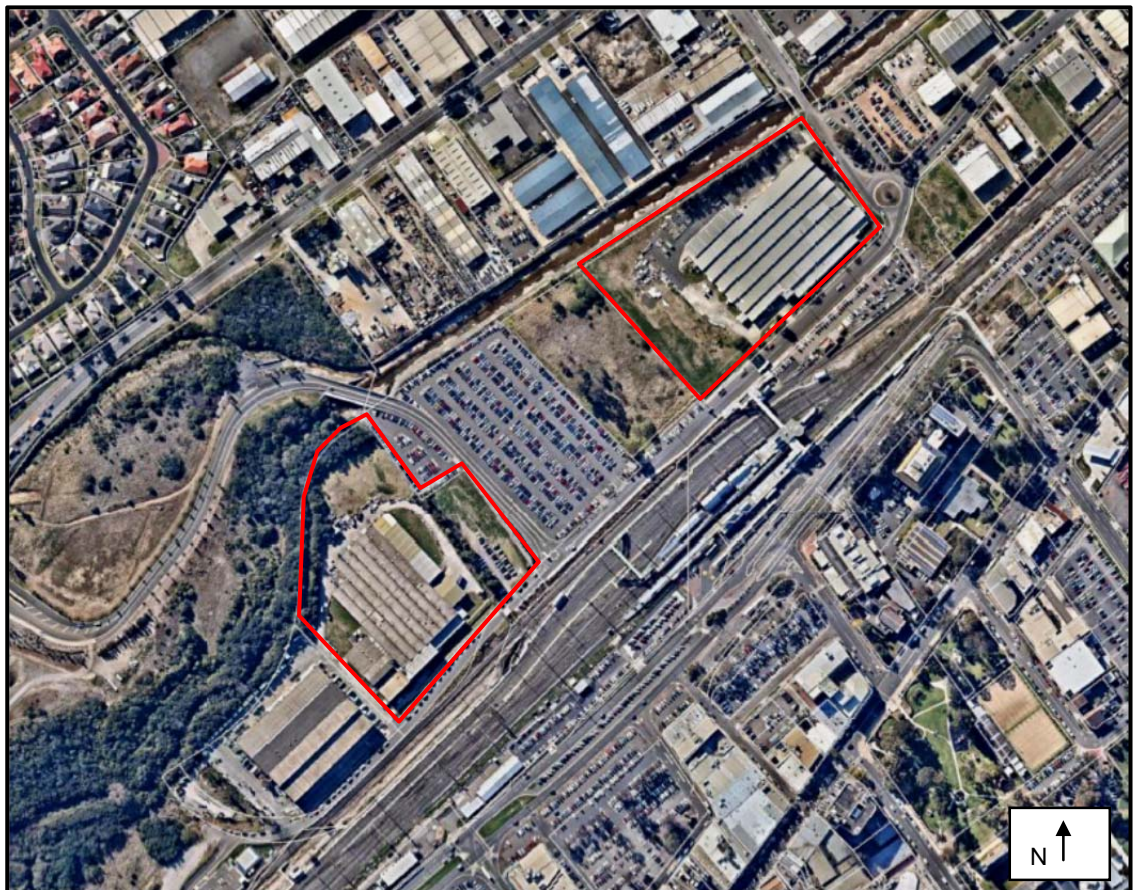


Figure 3: Location Plan (Source: PhotoMaps by Nearmap 10 August 2015)

5.2 The subject sites are unconstrained, of significant proportions and in single ownership

The draft corridor strategy has clearly demonstrated that the subject site is one that should be considered a priority site. As shown below, the constraints analysis identifies the site as being unconstrained, ready for redevelopment.

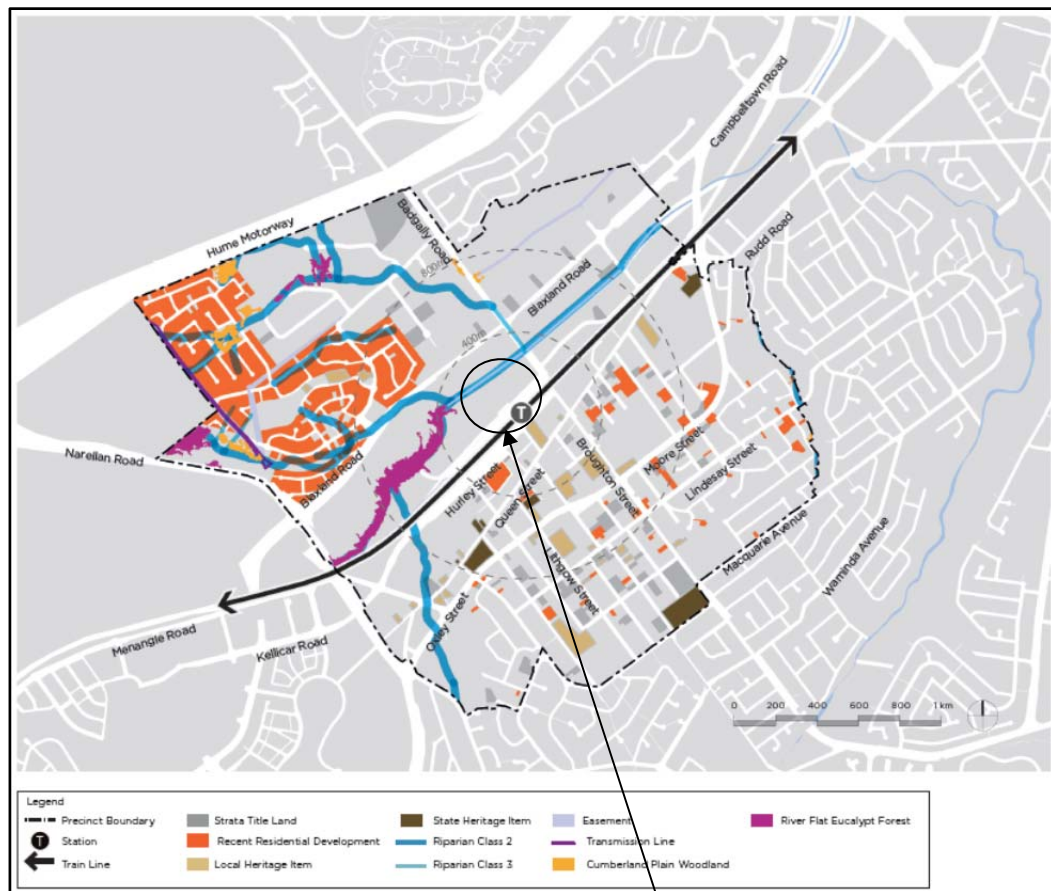


Figure 4: Source: Campbelltown Precinct Analysis, p. 15

Furthermore, 2 Farrow Road occupies a gateway position marking the arrival to the Campbelltown Central Business District from the North.

5.3 The subject sites can support significant building height and density, without adverse impact on local amenity

If appropriately developed the subject sites will activate the Farrow Road precinct and with the application of the right development standards development contributions via section 94 and/or voluntary planning agreements to connecting infrastructure will be economically feasible for the developer. To ensure that development remains feasible while making substantial contributions to public benefits, key development sites must be provided with suitable development capacity.

The draft corridor strategy suggests that the subject sites could support high rise development, but the assumption made is that highrise apartments are between 7 and 12 storeys with a FSR of 3:1 to 4:1. However, recent urban design work has revealed that the subject sites and precinct in general could support buildings of greater height as depicted in the figure below.



Figure 5: Potential building heights.

Source: Nettletontribe. Concept Design Report

Furthermore, with the additional building greater FSR should be permitted as demonstrated below.



Figure 6: Potential Floor Space Ratio.

Source: Nettletontribe. Concept Design Report

With the application of appropriate building heights and FSR the subject sites and northern portion of the Campbelltown precinct could support development and will renew and contribute to the revitalisation of Campbelltown. The following figure shows the possibility of positioning a landmark building at the south eastern corner of the subject sites, defining a prominent corner and entry to Campbelltown. Buildings of lesser heights and proportions surround. A mix of land uses could be permitted to create an urban environment which consists of recreational, business and residential opportunities to the locality.

Furthermore, with the extension of Broughton Street providing a connection to Badgally Road excellent connectivity will be the result. **Improved pedestrian access to the railway station and Central Business District of Campbelltown will enhance access.**



6. Conclusion

The draft Glenfield to Macarthur Urban Renewal Corridor Strategy is an encouraging start to the planning for urban renewal. The Strategy justly identifies the potential that exists in the corridor and makes promising advancements towards the development of local planning controls that may encourage investment into the region. However, it is argued that key sites, adjacent to the main railway station are deserving of increased building heights and floor space ratio development standards.